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state. *Georgia, etc., Co. v. Sassar*, 4 Ga. App. 276, 61 S. E. 505; *Hamilton v. Hannibal, etc., R. Co.*, 39 Kan. 56, 18 Pac. 57. But, by the better view, the courts of the forum are not bound by the construction placed upon a statute by the courts of the enacting state as to the penal nature of such statute, but will themselves decide whether the statute as construed by the courts of the state of its enactment is in fact penal in the sense that this term is used in private international law. *Huntington v. Attrill*, (1893) A. C. 150, 8 Times Law Rep. 341; *Southern Ry. v. Decker*, 5 Ga. App. 21, 62 S. E. 678; *Cary v. Schmelz*, 141 Mo. App. 570, 125 S. W. 532. See *Whitlow v. Nashville, etc., R. Co.*, 114 Tenn. 344, 84 S. W. 618, 68 L. R. A. 503; *Huntington v. Attrill*, 146 U. S. 657; 1 VA. L. REV. 395. The courts of the enacting state are considering the statute purely from the standpoint of municipal law; while the courts of the forum regard it from an entirely different standpoint, namely, that of private international law. And since the principles governing the two systems are so widely dissimilar, it would clearly seem that the courts of the forum should not be bound by the construction placed upon the statute by the courts of the state of its enactment. See *Huntington v. Attrill*, (1893) A. C. 150, 155; 1 VA. L. REV. 394. The opposite conclusion, however, has been reached in some jurisdictions. *Christilly v. Warner, supra*; *Commercial Nat. Bank v. Kirk*, 222 Pa. 567, 71 Atl. 1085.

CONSTITUTIONAL LAW—EQUAL PROTECTION OF THE LAW—DISCRIMINATION AGAINST ALIENS.—A statute prohibited any employer of more than five workers to employ less than eighty *per cent* qualified electors or native-born citizens of the United States. *Held*, the statute is unconstitutional, since it denies to aliens the equal protection of the law. *Truax v. Raich*, 36 Sup. Ct. 7. See NOTES, p. 390.

CONSTITUTIONAL LAW—STATE OFFICERS—POWER OF REMOVAL.—A state statute created the office of Motor Vehicles Commissioner and vested the power of appointment in the Board of Sinking Fund Commissioners. The statute provided for no fixed term of office and was silent on the question of removal. *Held*, the power of removal was not incident to the power of appointment. *Commissioners of Sinking Fund v. Byars* (Ky.), 180 S. W. 380. See NOTES, p. 388.

CONSTITUTIONAL LAW—VALIDITY OF STATE STATUTE FORBIDDING ACTS OF EMPLOYER TO PREVENT EMPLOYEE'S BELONGING TO LABOR UNION.—A state statute made it unlawful for an employer to prevent employees from joining or belonging to a labor union, or to coerce employees by threats of discharge because of their connection with a labor union. *Held*, the statute is unconstitutional, since it violates the Fourteenth Amendment protecting the freedom of contract from restrictive state laws. *Jackson v. Berger* (Ohio), 110 N. E. 732. For discussion of principles involved, see 2 VA. L. REV. 540.

CONSTRUCTIVE TRUSTS—PURCHASE BY AGENT—PAROL EVIDENCE.—The complainant employed the defendant, by parol, as agent to buy certain